



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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BWB:DMP  
F.#2011R02392

271 Cadman Plaza East  
Brooklyn, New York 11201

June 20, 2012

**By FedEx and ECF**

James R. Froccaro, Esq.  
20 Vandeventer Avenue, Suite 103W  
Port Washington, NY 11050

Re: United States v. Kwan Miller  
Criminal Docket No. 12-61 (JBW)

Dear Mr. Froccaro:

Enclosed please find supplemental discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure. This letter supplements the government's prior discovery letters and productions of February 15, 2012; March 1, 2012; April 2, 2012; April 11, 2012; April 13, 2012; April 16, 2012; April 18, 2012; April 19, 2012; April 23, 2012; April 24, 2012; and April 26, 2012. If you need copies of any of these prior letters and/or productions, please contact me. The government also reiterates its request for reciprocal discovery from the defendant.

I enclose a CD-ROM, Bates numbered KM 2898, containing recorded telephone calls from Kwan Miller. You may direct your attention to the following calls: (1) December 21, 2011 at 2:59 p.m., (2) December 22, 2011 at 9:07 a.m., (3) December 23, 2011 at 7:13 p.m.; (4) December 25, 2011 at 4:59 p.m., (5) December 27, 2011 at 8:03 p.m., (6) January 1, 2012 at 7:16 p.m., (7) January 10, 2012 at 5:08 p.m., (8) January 12, 2012 at 5:27 p.m., (9) February 20, 2012 at 6:36 p.m., and (10) February 24, 2012 at 5:41 p.m.

I also enclose a CD-ROM, Bates numbered KM 2899, containing the contents of an iPad with serial number GB039JV6Z39 seized from 300 Prospect Avenue, Apartment 11E, Hackensack, New Jersey, on December 20, 2011. The iPad was previously made available for the defendant's review and inspection. Since that time, the government has decoded the encryption on the iPad and is now able to produce the images of the contents of the iPad contained on this DVD.

If you have any questions, or further requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/ Douglas M. Pravda  
Douglas M. Pravda  
Assistant United States Attorney  
(718) 254-6268

Enclosures

cc: Clerk of Court (JBW) (w/o enclosures)